

United States District Court
NORTHERN DISTRICT OF OKLAHOMA

Exhibit "A"

MICHAEL PARGA, et al.,

Plaintiffs,

vs.

BOARD OF COUNTY COMMISSIONERS OF
THE COUNTY OF TULSA, et al.

Defendants.

Case No. 18-cv-00298-CVE-JFJ

AFFIDAVIT OF DAVID PARKER

STATE OF OKLAHOMA)
) ss.
COUNTY OF TULSA)

I, David Parker, of lawful age, upon my oath and subject to the penalties of perjury, state:

1. I serve as the Administrator of the David L. Moss Criminal Justice Center (also known as the "Tulsa County Jail" or "Jail"). I have personal knowledge of the statements made in this affidavit.
2. As of the date of my signature below, there are no suspected or confirmed COVID-19 cases in the Tulsa County Jail.
3. In mid-February, 2020, I began preparing a response plan for the threat of COVID-19. In doing so I consulted the Oklahoma Department of Corrections ("DOC") Pandemic Plan for H1N1, which in my prior employment as DOC's Director of Division II, I took part in creating.
4. Sheriff Regalado and I thereafter created a task force to develop a COVID-19 contingency plan should the virus make its way to Oklahoma.
5. As the World Health Organization ("WHO") and the Center for Disease Control ("CDC") began publishing information relevant to stopping the spread of COVID-19, I incorporated the WHO's and CDC's guidelines into TCSO's COVID-19 Response Plan.
6. The Tulsa City—County Health Department ("THD") was an integral partner who supplied TCSO with relevant and needed information concerning the necessary COVID-19 response in the Tulsa County Jail.
7. Guidelines were shared, meetings held, experts consulted and a COVID-19 Emergency Response Plan was drafted, revised and is continually being updated to meet the needs of the fluid nature of this pandemic.

8. The Tulsa County Sheriff's Office ("TCSO"), in partnership with the THD, Tulsa County District Court, Tulsa Area Emergency Management Agency ("TAEMA"), Turn Key Health Clinics, LLC ("Turn Key") and Summit Food Service, LLC ("Summit"), has implemented the comprehensive COVID-19 Response Plan for the Tulsa County Jail attached as Exhibit "C" to Defendant Tulsa County Sheriff's Response Brief to Plaintiff's Motion for a Temporary Restraining Order and Preliminary Injunction against Defendant Tulsa County Sheriff.
9. From March 9, 2020 to April 7, 2020, bookings at the Tulsa County Jail are down by more than fifty percent and the Total Jail Population has dropped more than 20%. See attached Exhibit.
10. Should anyone test positive for COVID-19 and require isolation, the Jail has eight negative air pressure cells for respiratory isolation in the Medical Housing Unit. In the event mass isolation is required, housing units F17 and F19 in the Jail have been prepared to house as many as 98 inmates for treatment. The Jail's maintenance department has effectively reversed the airflow in housing units F17 and F19 to create negative pressure. The maintenance department has also eliminated regular airflow from these housing units to other areas of the Jail.
11. In order to optimize Turnkey and the Jail's supply of PPE, the Turn Key and the Jail are in the process of constructing a PPE sterilization room for the purpose of sterilizing PPE to extend its lifespan and mitigate the risk of the Jail running out of PPE. This will allow the Jail to reuse PPE or extend PPE service life under appropriate circumstances.
12. As of March 16, 2020 all jail tours, program providers and visitation has been suspended at the Tulsa County Jail. The Tulsa County Jail continues to allow telephone calls and video visitation, provides free and confidential video visitation between attorney and client and allows each inmate/detainee one free video visitation each week.
13. TCSO has 38,000 bars of soap on hand with 40,000 on order along with the material to produce 100 gallons of hand sanitizer once received.

FURTHER AFFIANT SAYETH NOT.



David Parker, Jail Administrator

Subscribed and sworn to before me this 9th day of April, 2020.



Notary Public

My commission expires: April 29, 2023



Arrests on 3-9-2020

| inmatesbooked | ArrestingAgency |
|----------------------|--------------------------------|
| 36 | TULSA POLICE DEPARTMENT |
| 8 | TULSA COUNTY SHERIFF OFFICE |
| 4 | SAND SPRINGS POLICE DEPARTMENT |
| 3 | BROKEN ARROW POLICE DEPARTMENT |
| 2 | OKLAHOMA HIGHWAY PATROL |
| 1 | PROBATION & PAROLE OFFICE |
| 1 | GLENPOOL POLICE DEPARTMENT |
| 1 | JENKS POLICE DEPARTMENT |
| 1 | AGENCY OUTSIDE TULSA COUNTY |

Total Jail Population 3-9-2020

1290

Arrests of 4-7-2020

| inmatesbooked | ArrestingAgency |
|----------------------|--------------------------------|
| 18 | TULSA POLICE DEPARTMENT |
| 5 | TULSA COUNTY SHERIFF OFFICE |
| 2 | SAND SPRINGS POLICE DEPARTMENT |
| 1 | BROKEN ARROW POLICE DEPARTMENT |
| 1 | UNITED STATES MARSHALL |

Total Jail Population 4-7-2020

1025